

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ANN RUBIO,

Plaintiff,

v.

MIDLAND CREDIT MANAGEMENT,
et al.

Defendants.

Case No.: 3:10CV464

CONSENT MOTION

Defendants, by undersigned counsel and with the consent of plaintiff Ann Rubio, respectfully moves this Court for an extension of time to file a responsive pleading to plaintiff's Complaint until August 16, 2010. An agreed, fully endorsed order is attached to this motion for the Court's consideration.

Respectfully submitted,



Thomas L. Appler (VSB #06346)

Kathryn A. Grace (VSB #71213)

WILSON, ELSER, MOSKOWITZ,

EDELMAN & DICKER LLP

8444 Westpark Drive - Suite 510

McLean, Virginia 22102

(703) 245-9300

(703) 245-9301 (Fax)

Thomas.Appler@wilsonelser.com

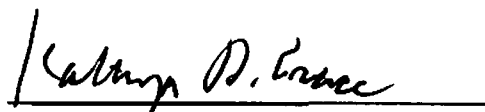
Kathryn.Grace@wilsonelser.com

*Counsel for defendants Midland Funding LLC and Midland
Credit Management, Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Consent Motion was served on counsel this 4th day of August, 2010 to:

Matthew J. Erausquin (VSB # 65434)
Consumer Litigation Associates, PC
1800 Diagonal Road, Suite 600
Alexandria, Virginia 22314
703-273-7770
888-892-3512 (fax)
matt@clalegal.com
Counsel for Plaintiff


Kathryn A. Grace, Esquire